



State of Ohio Environmental Protection Agency

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June 21, 2007

Mohammad Ali  
Waste Management  
American Landfill  
7916 Chapel Street, S.E.  
Waynesburg, OH 44688-9700

**Re: American Landfill, Stark County  
Ohio Administrative Code (OAC) Rule 3745-27-10(D)(7)(c)(ii) Approval**

Dear Mr. Ali:

On February 23, 2007, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Northeast District Office (NEDO) received a false statistical indication demonstration, dated February 22, 2007, for the American Landfill (Facility) located in Stark County. This document was submitted by Eagon & Associates, Inc. on behalf of American Landfill, and contains the ground water sampling results and the statistical analysis from the 2006 second semi-annual ground water detection monitoring event at the Facility.

According to the document, analysis of the ground water detection monitoring data indicated that the following statistically significant changes were detected: ammonia at monitoring wells AMW-7A and AMW-16 and PHL/BC-16; total chloride at monitoring wells LKC-3A, LKC-4, AMW-13, AMW-16, and PHL/BC-15; total sodium at monitoring wells LKC-3A, LKC-4, AMW-3, AMW-7A, AMW-11A, AMW-16, PHL/BC-1, PHL/BC-15, and PHL/BC-17; potassium at monitoring wells AMW-7A, PHL/BC-1, and PHL/BC-16; barium at monitoring wells PHL/BC-1, and PHL/BC-17; and benzene at monitoring well PHL/BC-4.

Pursuant to OAC Rule 3745-27-10(D)(7)(c)(ii), the owner or operator may demonstrate that a source other than the sanitary landfill facility caused the contamination, or that the statistically significant change resulted from error in sampling, analysis, or statistical evaluation or natural variation in ground water quality. A report documenting this demonstration must be submitted to and approved by Ohio EPA. If the owner or operator does not obtain approval to continue detection monitoring within two hundred ten (210) days from initial sampling, the owner or operator is required to comply with the provisions of OAC Rule 3745-27-10(E) for ground water quality assessment monitoring.

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

The February 22, 2007 document concluded that the statistically significant changes for total chloride and total sodium in wells LKC-3A and LKC-4; total chloride in wells AMW-3 and PHL/BC-15; total potassium and total sodium in well AMW-7A; ammonia in wells AMW-7A, AMW-16 and PHL/BC-16; total sodium in wells AMW-11A, AMW-16, PHL/BC-1, PHL/BC-15, and PHL/BC-17; total barium in wells PHL/BC-1 and PHL/BC-17; and total potassium in wells PHL/BC-1 and PHL/BC-16 were due to natural variation. The demonstration also contained adequate supporting information that sufficiently documents the SSIs of total chloride in well AMW-13 was due to natural variation and a source other than the landfill and the total chloride and total sodium in well AMW-16 were due to a source other than the landfill.

The owner or operator reported a SSI detection of benzene at the practical quantitation limit (PQL) reporting level of 1.0 µ/L at monitoring well PHL/BC-4. Subsequent re-sampling for benzene at monitoring well PHL/BC-4 was below the detection and reporting PQL of 1.0 µ/L. The demonstration contained adequate supporting information that sufficiently documents the use of the 1 of M re-sampling method to demonstrate that the SSI over background was a false positive.

Ohio EPA has reviewed the applicable information and concurs with the demonstration included in the February 22, 2007 document. Therefore, pursuant to OAC Rule 3745-27-10(D)(7)(c)(ii), the owner or operator is hereby authorized to continue the detection monitoring program at the Facility for monitoring wells LKC-3A, LKC-4, AMW-3, AMW-7A, AMW-11A, AMW-13, AMW-16, PHL/BC-1, PHL/BC-4, PHL/BC-15, PHL/BC-16 and PHL/BC-17.

Should future or existing ground water sampling results indicate statistically significant changes in ground water monitoring parameters, the owner or operator will be required to either enter into assessment monitoring in accordance with OAC Rule 3745-27-10(E) or obtain approval to remain in the detection monitoring program.

You are hereby notified that this action of the Director of Ohio EPA (Director) is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals

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Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street  
Room 222  
Columbus, Ohio 43215

If you have any questions concerning this letter, please contact Joshua Adams of Ohio EPA, DSIWM-NEDO at 330-963-1103.

Sincerely,

William T. Skowronski, Chief  
Northeast District Office  
for Chris Korleski, Director

cc: Scott Hester, DSIWM, CO  
Lynn Sowers, DSIWM, NEDO  
Karen Naples, DSIWM, NEDO  
Doug Dobransky, DDAGW, NEDO  
Kirk Norris, Stark County Health Department